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Attorneys for Defendants
7 *Larry Williamson, M.D. and*
8 *Raymond Mondora, M.D.*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 MICHAEL RODRIGUEZ,
13 Plaintiff,
14 vs.
15 NAPHCARE, et al.,
16 Defendants.
17

CASE NO. 2:17-cv-02344-RFB-CWH

**DEFENDANTS LARRY
WILLIAMSON, M.D. AND RAYMOND
MONDORA, M.D.'S MOTION TO
EXTEND TIME TO RESPOND TO
PLAINTIFF'S MOTION TO COMPEL
DISCOVERY (ECF NO. 99)**

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19 COME NOW Defendants Larry Williamson, M.D. and Raymond Mondora, M.D.
20 (Defendants) by and through their attorneys of record, LEWIS BRISBOIS BISGAARD &
21 SMITH, LLP, and request an extension of time in which to file their Response to Plaintiff's
22 Motion to Compel (ECF No. 99) pursuant to FRCP 6(b)(1) and LR IA 6-1. An extension
23 of 14 days is requested, with a new due date for Defendants' Response of Thursday,
24 February 21, 2018. This Motion is made and based upon the following Memorandum of
25 Points and Authorities.

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Pursuant to FRCP 6(b)(1) and LR IA 6-1, Defendants Larry Williamson, M.D. and
3 Raymond Mondora, M.D. respectfully request a 14 day extension of time to file and serve
4 their Response to Plaintiff's Motion to Compel. (ECF No. 99). Plaintiff filed the Motion
5 on January 24, 2019. The Motion is 29 pages¹ and addresses 40 separate discovery
6 requests and responses.

7 In light of the detailed analysis required to fully respond to Plaintiff's Motion to
8 Compel, Defendants maintain good cause exists for a brief extension of time in which to
9 file their Response. Defendants respectfully request the Court grant a 14 day extension of
10 time to file and serve a Response to Plaintiff's Motion to Compel, resulting in a new due
11 date of Thursday, February 21, 2018.

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26 ¹ Plaintiff's Motion is single spaced (handwritten). If it had been typed and double-
27 spaced, the Motion would likely exceed 50 pages.

1 CONCLUSION

2 Based on the foregoing, Defendants Drs. Williamson and Mondora respectfully
3 request the Court grant an extension of time to respond to Plaintiff's Motion to Compel up
4 to and including February 21, 2018. The extension is sought in good faith, and not to
5 delay resolution of this matter.

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7 DATED: January 28, 2019.

8 LEWIS BRISBOIS BISGAARD & SMITH LLP
9

10
11 By /s/ Katherine J. Gordon

12 S. BRENT VOGEL

13 Nevada Bar No. 6858

14 KATHERINE J. GORDON

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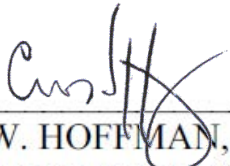
17 Las Vegas, Nevada 89118

18 Tel. 702.893.3383

19 *Attorneys for Defendants Larry Williamson,*
20 *M.D. and Raymond Mondora, M.D.*

21 IT IS ORDERED that defendants Williamson and Mondora's motion to extend
22 time to respond to plaintiff Rodriguez's motion to compel (ECF No. 101) is
23 GRANTED. Responses to the motion to compel (ECF No. 99) are due February
24 21, 2019.

25 DATED: Jan 29, 2019

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28 C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on the 28th day of January 2019, I electronically filed the
3 foregoing **DEFENDANTS LARRY WILLIAMSON, M.D. AND RAYMOND**
4 **MONDORA, M.D.'S MOTION FOR EXTENSION OF TIME TO RESPOND TO**
5 **PLAINTIFF'S MOTION TO COMPEL (ECF NO. 99)** with the Clerk of the Court
6 through Case Management/Electronic Filing System.
7

8 **CERTIFICATE OF MAILING**

9 I HEREBY CERTIFY that on the 28th day of January 2019, I served a true and
10 correct copy of the foregoing **DEFENDANTS LARRY WILLIAMSON, M.D. AND**
11 **RAYMOND MONDORA, M.D.'S MOTION FOR EXTENSION OF TIME TO**
12 **RESPOND TO PLAINTIFF'S MOTION TO COMPEL (ECF NO. 99)** by depositing a
13 copy of same in the United States Mail at Las Vegas, Nevada postage fully prepaid,
14 addressed to:
15

16
17 Michael Rodriguez
18 1893015
19 Clark County Detention Center
20 330 South Casino Center
21 Las Vegas, NV 89101
22 PRO SE Plaintiff

23 By /s/ Adrina Harris
24 Adrina Harris, an Employee of LEWIS
25 BRISBOIS BISGAARD & SMITH LLP
26
27
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